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12 Attorneys for Defendant

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 KIMBERLEE ANN DESROSIERS,) Case No.: 2:15-cv-01033-JCM-VCF
16 Plaintiff,) STIPULATION AND PROPOSED ORDER
17 vs.) FOR AN EXTENSION OF TIME
18 CAROLYN W. COLVIN, Acting) TO ANSWER AND FILE THE
Commissioner of Social Security,) ADMINISTRATIVE RECORD
Defendant.)

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21 IT IS HEREBY STIPULATED, by and between the parties, through their respective
22 counsel of record, that Defendant shall have a 30-day extension of time, to and including
23 September 16, 2015, to answer and file the administrative record. Defendant requests this
24 extension because the administrative record is not yet available to file and serve.

25 The parties further stipulate that the Court's Scheduling Order shall be modified
26 accordingly. Counsel apologizes to the Court for any inconvenience caused by this delay.
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28

1 Respectfully submitted,
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3 Dated: August 13, 2015
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5 By: /s/ Marc V. Kalagian*
6 MARC V. KALAGIAN
7 (* As authorized via email on August 13, 2015)
8 Attorney for Plaintiff
9

10 Dated: August 13, 2015
11

12 DANIEL G. BOGDEN
13 United States Attorney
14 BLAINE T. WELSH
15 Chief, Civil Division
16

17 By: /s/ April A. Alongi
18 APRIL A. ALONGI
19 Special Assistant U.S. Attorney
20 Attorneys for Defendant
21

22 ORDER
23

24 Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY ORDERED,
25 that Defendant shall have an extension of time, up to and including September 16, 2015, in which to
26 file and serve the administrative record. All other deadlines set forth in the Scheduling Order are
27 modified accordingly.
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IT IS SO ORDERED.

Dated: 8-14-2015


21 _____
22 UNITED STATES MAGISTRATE JUDGE
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1 **DEFENDANT'S CERTIFICATE OF SERVICE**
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3

4 I certify that I caused a copy of the Stipulation and Proposed Order for an Extension of Time to
5 Answer and File the Administrative Record to be served, via CM/ECF notification, on:

6 MARC V. KALAGIAN
7 Attorney at Law: 4460
8 211 East Ocean Boulevard, Suite 420
9 Long Beach, California 90802

10 GERALD M. WELT
11 Attorney at Law: 1575
12 703 South Eight Street
13 Las Vegas, Nevada 89101

14 Date: August 13, 2015

15 DANIEL G. BOGDEN
16 United States Attorney
17 BLAINE T. WELSH
18 Chief, Civil Division

19 By: /s/ April A. Alongi
20 APRIL A. ALONGI
21 Special Assistant United States Attorney

22 Attorneys for Defendant